

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

**CORNERSTONE CREDIT UNION
LEAGUE and CONSUMER DATA
INDUSTRY ASSOCIATION,**

Plaintiffs,

v.

**CONSUMER FINANCIAL PROTECTION
BUREAU and RUSSELL VOUGHT in his
official capacity as Acting Director of the
CFPB,**

Defendants.

No. 4:25-cv-00016-SDJ

**UNOPPOSED MOTION FOR LEAVE TO FILE
CONSOLIDATED TWENTY-FIVE PAGE BRIEF**

Defendant-Intervenors seek this Court's permission to file a single twenty-five page memorandum of law in response to both Plaintiffs' Motion for Preliminary Injunction, ECF No. 9, and the Joint Motion for Entry of Consent Judgment, ECF No. 31, to the extent that leave is necessary. In support of this motion, Defendant-Intervenors state as follows:

1. Two motions are pending before this Court, Plaintiffs' Motion for Preliminary Injunction, ECF No. 9, and the Joint Motion for Entry of Consent Judgment, ECF No. 31. These two motions consist of, respectively, twenty and five pages.

2. This Court has proposed consolidation of the merits of this matter with the pending motions. To the extent that the consolidation addresses solely those matters that have been briefed, Defendant-Intervenors do not object to the consolidation. Local Rule CV-7 sets forth a page limit of thirty pages for responses to dispositive motions.

3. Plaintiffs and Defendants do not oppose Defendant-Intervenors filing a brief of twenty-five pages to collectively respond to the two pending motions.

WHEREFORE, Defendant-Intervenors respectfully request that, to the extent necessary, the Court grant them leave to file a twenty-five page consolidated brief in response to the two pending motions.

Dated: May 22, 2025

Respectfully submitted:

/s/ Jennifer S. Wagner
Jennifer S. Wagner (admitted *pro hac vice*)
NY Reg. No. 6083463
Chi Chi Wu (admitted *pro hac vice*)
MA Bar No. 560178
National Consumer Law Center
7 Winthrop Square
Boston, MA 02110
Ph: 617-542-8010
jwagner@nclc.org
cwu@nclc.org

Carla Sanchez-Adams
Texas Bar No. 24070552
National Consumer Law Center
1001 Connecticut Avenue, NW
Suite 510
Washington, DC, 20036
Ph: 202-452-6252
Fax: 202-296-4062
csanchezadams@nclc.org

Counsel for Defendant-Intervenors

CERTIFICATE OF SERVICE

I certify that on May 22, 2025, the foregoing document was filed on the Court's CM/ECF system which sent notification of such filing to all counsel of record.

/s/ Jennifer S. Wagner

CERTIFICATE OF CONFERENCE

Undersigned counsel has complied with the meet and confer requirement in Local Rule CV-7(h) by contacting counsel for all parties by email on May 20 and May 21, 2025. Plaintiffs and Defendant have both stated that they do not oppose this motion.

/s/ Jennifer S. Wagner